

Your Name: MR. & MRS. DENNIS & YVONNE JOHNSON

Address: 5228 COLEMAN ST., NORTH LAS VEGAS, NV 89031

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Pro Se Plaintiff

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MAR 24 2023

CLERK US DISTRICT COURT
DISTRICT OF NEVADA

BY: la DEPUTY

UNITED STATES DISTRICT COURT
DISTRICT OF

DENNIS CRAIG JOHNSON

YVONNE JOHNSON

Plaintiff,

vs.

UNITED STATES

Defendant.

2:23-cv-00447-JAD-NJK

COMPLAINT

DEMAND FOR JURY TRIAL

Yes ☒ No ☐

JURISDICTION

[Usually only two types of cases can be filed in federal court, cases involving "federal questions" and cases involving "diversity of citizenship." Check at least one box.]

1. My case belongs in federal court

☒ under federal question jurisdiction because it involves a federal law or right.

[Which federal law or right is involved?] Space here does not permit enough space for the full list. Please see the attached page titled, "Pro Se Complaint for a Civil Case Continued" on Page 1 for the full and complete list.

☐ under diversity jurisdiction because none of the plaintiffs live in the same state as any of the defendants and the amount of damages is more than \$75,000.

VENUE

[Nevada is one "judicial district." Check the box for each venue option that applies.]

2. Venue is appropriate in this Court because:

- ☒ a substantial part of the events I am suing about happened in this district.
- ☒ a substantial part of the property I am suing about is located in this district.
- ☒ I am suing the U.S. government, federal agency, or federal official in his or her official capacity and I live in this district.
- ☐ at least one defendant is located in this District and any other defendants are located in California.

INTRADISTRICT ASSIGNMENT

[This District has two unofficial divisions. One is the "Northern Division" covering northern Nevada including Carson City, Churchill, Douglas, Elko, Eureka, Humboldt, Lander, Lyon, Mineral, Pershing, Storey, Washoe and Whitepine counties at the courthouse in Reno. One is the "Southern Division" covering southern Nevada including Clark, Esmeralda, Lincoln, and Nye counties at the courthouse in Las Vegas.]

3. Because this lawsuit arose in CLARK County, it should be assigned to the "SOUTHERN" Division of this Court.

PARTIES

1. Plaintiff. [Write your name, address, and phone number. Add a page for additional plaintiffs.]

Name: MR. DENNIS CRAIG JOHNSON

Address: 5228 COLEMAN ST. NORTH LAS VEGAS, NV 89031

Telephone: 310-994-5328 (Cell ph.)

See the attached, "Pro Se Complaint for a Civil Case" Page 1, for other Plaintiff.

2. Defendants. [Write each defendant's full name, address, and phone number.]

Defendant 1:

Name: UNITED STATES

Address: [if Defendant is an individual do not list home address, just use county and state]

Telephone: _____

Defendant 2:

Pro Se Complaint for a Civil Case Continued:

Mr. & Mrs. Dennis & Yvonne Johnson vs. United States

JURISDICTION

1.

[Which federal law or right is involved?]

1. Discrimination to Provide Medical Care at the N LV NV VA Medical System;
2. Negligence - Life-Threatening Medication Errors at the N LV NV VA Medical System;
3. Negligence - Mishandling of VA Medical Records-Falsifying the VA Medical Record-Unlawful Destruction of the VA Medical Record;
4. Negligence - Mishandling of the Veteran's VA Compensation File-Failure to Remove Expunged Erroneous Medical Records;
5. Negligence - Mishandling of the Veteran's VA Compensation File - Failure to Protect Privacy and Confidentiality;
6. Negligence - Failure to Maintain and Provide Accurate and Adequate VA Medical Records;
7. Hostile and Abusive Environment Within the N LV NV VA Medical System - Failure to Provide a Safe Environment;

PARTIES

1. Plaintiff. [Write your name, address, and phone number. Add a page for additional plaintiffs.]

Name: MRS. YVONNE JOHNSON

Address: 5228 COLEMAN ST. NORTH LAS VEGAS, NV 89031

Telephone: 310-994-5328 (Cell Ph.)

1 Name: N/A

2 Address: [if Defendant is an individual do not list home address, just use county and state]

3 Telephone: _____

4 Defendant 3:

5 Name: N/A

6 Address: [if Defendant is an individual do not list home address, just use county and state]

7 Telephone: _____

STATEMENT OF FACTS

8

9

10 [Write a short and simple description of the facts of your case. Include basic details such as where

11 the events happened, when things happened and who was involved. Put each fact into a separate,

12 numbered paragraph, starting with paragraph number 6. Use more pages as needed.]

13 1. We begin with the fact this is the first lawsuit Dennis or I have ever filed, that is except for in

14 2020, we filed what was a lawsuit, so that would have been our very first lawsuit, it was so

15 we would finally receive a copy of Dennis's VA Compensation File (VA C-File). We had con-

16 cerns and hoped it would help. It did. We address Dennis's VA C-File, the problem we had

17 obtaining Dennis's copy of it, and then the problems we discovered in it later in this SOF's.

18 2. First, we are grateful to the VA System it took good care of Dennis since his enrollment at

19 VA in 1998 through 2016. During that time period Dennis's healthcare was well managed

20 within VA, first managed by the Arizona VA System, then the California VA System, then the

21 Arizona VA System again, then in 2013-2014 when he was first enrolled in this N LV NV VA

22 System. During this time he/we experienced no problems within the VA System 1998-2016.

23 3. The following SOF's are taken directly from our VA95 Claim we submitted on 7/11/2020:

24 Dennis suffered discrimination, neglect, and his VA medical records were mishandled within

25 the N LV NV VA. This began on June 21, 2017 when he was first pressured by Doctors' and

26 Staff at the LV NV VA SEC it was to make Dennis return to the Arizona VA System, what

27 they repeatedly referred to as "his" VA System and where Dennis had been previously en-

28 rolled. When Dennis remained at the N LV NV VA System as was his wish and his right

1 to do so, the N LV NV VA System displayed what became an unrelenting animosity toward
2 Dennis then myself. Further improprieties occurred in the order they happened: "life-threat-
3 ening medication errors"; "improper transfers of his care"; "neglect of needed care and ser-
4 vices"; "improper alteration made to his VA Medical Records"; "oppression of needed ser-
5 vices"; VA failure to respond to us, whatsoever, to our - VA record amendments to correct
6 VA medical record and also the VA C-File; then, we discovered improper VA medical record purges.

7 4. On April 18, 2017 was Dennis's re-establishment appointment they referred to it as his
8 vetting appointment at LV NV VA SEC with a VA PCP a Dr. Trinidad NP which seemed to go very
9 well, although later we learned Dr. Trinidad NP questionably transferred Dennis to another
10 VA SEC PCP, a Dr. Oliveria MD, and Dr. Trinidad NP put into his VA Medical Record about
11 this transfer "CHIEF COMPLAINT: change new PCP". We had Not initiated this transfer as it is made
12 to appear in his VA Medical Records. We had told her at appt. we were thankful to have her.

13 5. Dennis's next appointment was on June 21, 2017. When we arrived we learned it had been can-
14 celled. I, wife, had formally confirmed this appointment a couple days prior. It was further
15 confirmed a few hours prior to his appointment time when LV NV VA SEC suddenly called
16 us when we were on our way to this appointment. LV NV VA SEC wanted to know if Dennis
17 was coming but they wanted to cancel it. Their tone on the phone was odd, rejecting. I, wife,
18 said to them on the phone, "we confirmed day before yesterday and we are now on our way, see you
19 shortly thank you", yet when we arrived it was canceled with no explanation. I, wife, stated
20 this appointment had not been cancelled and we waited resolutely, and Dennis was seen.

21 6. At this same appointment on June 21, 2017 Dennis was initially denied needed Specialist's for his
22 VA SC conditions, a Neurologist and a Cardiologist. We were told at his previous appoint-
23 ment on April 18, 2017 by Dr. Trinidad NP Dennis would receive his Specialist's at his next, this appt.

24 7. A couple weeks later Dr. Oliveria MD made life-threatening medication errors that if I, wife,
25 had not caught it, then assertively stayed on it, had the direct potential to threaten his life.

26 8. Both Dr. Oliveria MD and her male Nurse Assistant they both said to us and said sharply, at this
27 June 21, 2017 appointment, "why are you here?" "You belong at Arizona VA System". Again,
28 Dennis's first appointment here on April 18, 2017 went fine. A fact is we also have an Arizona add-

1 res. I was given reason to believe they used this fact as reason to try not to serve Dennis
2 here with his many complex medical issues. They were very put off by his complex health
3 issues, to have been there with us you would, like us, have witnessed their extreme dismay of this
4 fact. It was confusing we expect Doctors to treat the ill. VA's ill patients are our Hero's.

5 9. Given all that was happening, it was July 2017 I finally filed a formal complaint, a VA IRIS
6 complaint, and I further requested a transfer of VA PCP and we moved on within this LV NV VA Sys.

7 10. Dennis's next appointment at LV NV VA SEC was on August 14, 2017 with his next new
8 VA PCP, a Dr. S. Billmeyer MD. Dr. S. Billmeyer MD said he was aware of the VA IRIS Complaint I
9 filed dtd July 19, 2017. He asked what had happened. I, wife, explained to him, "it did not go
10 well" and I asked him if he could just please read the Complaint for the details if needed it
11 was in Dennis's VA Medical Records; and, I then asked him if we could now just please focus on

12 this appointment my Husband's needs met. Dr. S. Billmeyer MD was visibly not happy about
13 the Complaint, this was obvious throughout this appointment. Dr. Billmeyer MD even stated later in
14 this appointment in a cold condescending tone to Dennis, "You do not look demented". He
15 remained Dennis's VA Provider until Dennis's next six (6) month follow-up appointment in
16 May 2018, this is when Dennis's transfer to another VA PCP I, wife, requested went through

17 11. Dennis's transfer was to a LV NV VA PCP, Dr. Gauron MD @ LV NV VA Laughlin Clinic.
18 Dennis's first appointment with him was on May 29, 2018. It went well, seemingly very well. Dennis's
19 following VA six (6) month appointments, however, Dr. Gauron MD was replaced by another
20 Provider, her name was Ms. Svetlana Eveleigh NP. I discovered later she was from LV NV
21 VA SEC the same Clinic that had mishandled Dennis, this the SEC Clinic of Dr. S. Billmeyer MD,
22 Dr. Oliveria MD and Dr. Trinidad NP. LV NV VA SEC had reattached to Dennis and his care
23 without our knowledge and for the previous last three 6-mo. appts. so for the previous 18 months.

24 12. I later discovered Dennis's VA Medical Records underwent a massive purge during this
25 timeframe, the timeframe LV NV VA SEC reattached themselves to Dennis's care. The purged VA
26 Medical Records have in common they support the fact Dennis was mishandled at LV NV VA SEC
27 by and while he was under the care of LV NV VA SEC and their Doctors' - Dr. S. Billmeyer
28 MD, Dr. Oliveria MD and Dr. Trinidad NP.

1 13. On August 20, 2017 I, wife, sent the LV NV VA SEC a VA SecureMessage whereby I
2 provided important clarifications for the record about some ambiguous and inaccurate state-
3 ments Dr. S. Billmeyer MD had written in Dennis's medical record for appt. dtd August 14, 2017. I
4 watched for months for this clarification message of facts sent to be posted to his VA Med-
5 ical Records, per VA policy to do so, and had always been done, but it was not posted.

6 14. On November 24, 2017 I, wife, formally requested LV NV VA SEC to post this message
7 to Dennis's VA Medical Records. We received no response again.

8 15. On December 7, 2017 this message is finally posted to the VA Medical Records, yet, we see the
9 VA SEC physically altered my message before they posted it which made it ambiguously
10 demean Dennis.

11 16. On February 22, 2018 I, wife, wrote LV NV VA ROI to make them aware my message posted on
12 December 7, 2017 had been physically altered by the LV NV VA SEC before they posted it.
13 I requested it be changed back to its original version.

14 17. The VA ROI did not, would not, change my message back to its original version. Instead
15 VA ROI said, "We find the information you requested to be amended is accurate". This is un-
16 equivocally not true. I proved it. VA ROI returned all of my papers I submitted to them in
17 support of my request EXCEPT my original that showed my original message so unaltered.
18 Did they think I would not have another one? I do have another one. Next, VA ROI sent me a copy of
19 the copy they deemed corrected and they stamped that copy CORRECTED COPY, but this copy is
20 the Altered Copy. I have the paperwork that absolutely shows VA ROI did this, mishandled
21 this request to amend the record. Furthermore, the paperwork shows that they did not correct his VA
22 Medical Record. It was kept in the VA records FALSIFIED. Moreover, VA ROI and VA SEC
23 left the altered copy in his VA Medical Records and stamped it CORRECTED COPY thus are trying
24 to make a falsified copy real. To this day it remains uncorrected. This instance was not only
25 retaliatory it was done with malice. How this was handled by VA SEC and VA ROI mimicks a form of
26 "gaslighting". *After this, reviewing the VA medical record closely we discovered and can show a
27 page had been improperly removed from Dennis's VA medical record. We show it had pre-
28 viously been in his VA medical record prior, this page removed shows this manipulation occurred.*

18. The LV NV VA SEC oppressed needed services including, but not limited to, Diabetic Care services and supplies Dennis needed and should have received, supplies he had always received from VA in the past and he had received from this LV NV VA in 2013.

19. The LV NV VA denied, this one I postulate, Dennis's need for Home Health Care services at time of an appointment at Laughlin VA Clinic under Ms. S. Eveleigh NP. Dennis had just recently then been diagnosed and just rec'd VA SC for Diabetic Neurogenic Bladder/incontinence Dennis was drained/ill at this appt. She denied it with no further discussion and his illness then was not addressed. Dennis had been approved for Home Healthcare here in 2013.

20. August 8, 2019 at a Urology appointment at the LV NV VA Medical Center the Doctor, a Dr. Krawitt MD, verbally marginalized me, wife, and Dr. Krawitt MD would not honor our request to put Dennis's options available to him in writing in accordance with his "Veterans Health Benefits Handbook" in Ch.8, pg. 32, this Dennis's right. Dr. Krawitt MD would not he refused to do this. This not only goes here under 'retaliation' but likely also fits under 'oppression of services'

21. On December 7, 2019 we attended a VA Compensation & Pension Exam held at the LV NV VA Medical Center. The Evaluator, a Physiatrist, he behaved with an underlying anger!? He had an almost uncontrollable cough. He repeatedly coughed without covering his mouth on Dennis and myself within three (3) feet while facing us. He was a Doctor for heavens sake, a Physiatrist no less, he would know better than to cough on a Diabetic with other complex health issues. We became very ill with same cough. This cannot be easily proved, I know.

22. We discovered in May 2020 a massive and selective purge was performed throughout Dennis's LV NV VA Medical Records.

23. Another discovery of missing pages in Dennis's VA medical record is a portion of Dennis's 2013 appt. record w/Dr. Tudla MD the portion missing shows Dennis was vetted at LV NV VA 2013.

24. The purge of VA records is discovered to include, but is not limited to, the following:

Listed below are three (3) instances of over a hundred instances throughout Dennis's VA Medical Records that were purged in whole or in part from his VA Medical Record -

*Appointment with Dr. Tudla MD - Date/Time: 08 Oct 2013 @ 1204 Note Title: AMB CARE-PROGRESS NOTE Location: VA Southrn Nevada Hlthcare Sys Signed By: TUDLA, JEFFREY F

Co-signed By: TUDLA, JEFFREY F Date/Time Signed: 09 Oct 2013 @0809.

*Appointment with Dr. Tudla MD - Date/Time: 08 Oct 2013 @ 0816 Note Title NURSING

OUTPATIENT NOTE: Location: VA Southm Nevada Hlthcare Sys Signed By: MARTIN, GINGER

Co-signed By: MARTIN, GINGER Date/Time Signed: 08 Oct 2013 @ 0828.

*Multiple VA Medical Records during Dennis's two (2) Pain Management appointments with Dr. Gary Karl MD – Here appointment dtd 7/26/2017.

25. Listed below are discovered other instances of Dennis's appointments that were purged in whole or in part from his VA Medical Records -

*April 18, 2017 appointment w/Dr. Trinidad NP.

*June 21, 2017 appointment w/Dr. Oliveria MD.

*July 26, 2017 appointment w/Dr. Gary Karl MD.

*August 14, 2017 appt. w/Dr. S. Billmeyer MD.

*August 29, 2017 appointment w/Dr. Gary Karl MD.

*May 29, 2018 appointment w/Dr. Gauron MD.

*August 8, 2019 appt. w/Dr. Krawitt MD Urologist.

*August 9, 2019 appointment w/Dr. S. Eveleigh NP.

26. Listed below are discovered other instances of Dennis's Medical Records that were purged in whole or in part from his VA Medical Records -

*Multiple VA Medical Records of Dennis's VA medication refill requests and the VA Pharmacy records of all those refills approved.

*Multiple VA Medical Records of Dennis's Emergency Room visits.

27. Of Note: Some of the purged VA Medical Records purged from his VA Medical Records were discovered later returned to his VA Medical Records later, yet some of them remain missing.

28. Listed below is one instance of many instances discovered in Dennis's VA Medical Records of purged VA Medical Records, AND, this record remains missing in Dennis's VA Medical Rec.

*MISSING RECORD - Dennis's VA Medical Records that immediately followed - /es/ RICHARD W HIBBEN Staff Dentist Signed: 10/09/2013 16:35.

29. Next, with regard to the problems discovered within Dennis's VA C-File:

1 October 25, 2020 I sent a letter with an attached notebook to VA Compensation & Benefits
2 Division in Saint Louis MO that informed and showed them the problems just discovered in
3 his VA C-File. The problems are we have discovered there are 200+ pages in his VA C-File
4 that contain erroneous medical records on each of these 200+ pages, and I explained that
5 all the erroneous medical records found here are the same erroneous medical records that VA had
6 mandated expunged/removed in 2006 from any and all of Dennis's VA records. I also req-
7 requested they remove these erroneous medical records now from Dennis's VA C-File. The
8 notebook I had attached I had placed all 200+ pgs. I found and highlighted the erroneous
9 records to help expedite the process. We did not get a response from VA whatsoever.

10 30. Given all the problems and now this discovery and VA still not responding to us, I contact-
11 ed the Office of Civil Rights for support. Important to say here is another problem we discovered on
12 these 200+ pages is they all appear to indicate on the bottom of each page is each of these
13 pages had been released out in 2008, 2013 and 2019 but does not say where. It happens each of
14 these dates is just after we had filed a significant VA Compensation Claim. But, again, pgs.
15 do not indicate where or to whom they were released. You may remember at the beginning of this
16 SOF's I stated with some detail that we were not provided Dennis's VA C-File timely. We
17 had actively pursued Dennis's rightful copy of his VA C-File for 1+ year and did not receive
18 any response from the VA whatsoever during that time. To get Dennis's copy of his VA C-File we
19 were advised to file suit this included a \$400 filing fee. We did and rec'd it 10 days after filing.

20 31. In the Spring of 2020 Dennis now under the care of a 6th LV NV VA PCP, a Dr. Kahn MD
21 located at LV NV VA Medical Center. This time this VA PCP at Dennis's one and only appointment
22 with him was very distant with us and visably nervous during the entire appointment. He did
23 not look into Dennis's or my eyes once during the entire appointment. I, wife, asked Dr. Kahn about
24 his experience with Agent Orange illnesses. Dr. Kahn MD responded he did not know about
25 Agent Orange, all the time only staring at his computer screen. Agent Orange is the nature
26 of Dennis's health conditions so we thanked Dr. Kahn and we did not return to him. I, wife, requested
27 a transfer of care to another VA PCP.

28 32. November 2020 problems continue under Dennis's next PCP this is his 7th PCP at LV NV VA

1 since 2017, a Dr. Cox MD. Dennis's last PCP at LV NV VA because problems never resolv-
2 ed would not stop only escalated and worsened over time then the discovery of Dennis's
3 VA medical records purged. Dennis no longer felt safe there removed his care in 02/2020.
4 We discovered and we will show Dennis's VA medical records were so manipulated that it
5 was some type of destruction event that occurred after 2017 and it unfolded over a 1-1/2 year time
6 frame. This all indicated to us several personnel must be involved. We lost trust in LV NV VA
7 33. The problems Dennis experienced under the care of Dr. Cox were especially disturbing.
8 This last PCP he spent the first 30 min. of Dennis's appointment in neighboring room on the
9 phone and typing. We heard him he was concerned about Dennis being there. We were con-
10 fused, we knew we could be there. Then he and his Nurse treated both of us with an intense
11 suspicion. It was like an interrogation. Ok, so we obliged. Then Dr. Cox, then his Nurse both
12 tested his feet and Dr. Cox wrote they were 'normal'. Dennis's feet are not normal. He has
13 100% VA SC Diabetic Neuropathy in both feet and legs. During this appointment I had witnessed
14 Dennis did not feel most of the pokes to the bottom of his feet. Of further concern, I later
15 found in Dennis's VA medical record Dr. Cox added an amendment to Dennis's appointment
16 record that read both of Dennis's parents had Diabetes. This had not been discussed. This
17 was not true. The previous Dr. Gauron had done this exact same thing. OCR has since removed both
18 of these false records. OCR was able to confirm this was not true and had VA remove them.
19 I had to involve OCR, VA would not remove these for me. VA was ignoring all my requests.
20 Dr. Cox also filled pages of Dennis's appointment record with pages of his past medical rec-
21 ords, these records were correct so not a problem. Lastly, also concerning this PCP would
22 not schedule Dennis's next 6-mo. f/u appointment properly, it would be missed, he would not
23 see Dennis until 11 mo. later instead of his always 6-mo. follow-ups. I brought this to his attention
24 Dennis was always seen at 6 mo. sometimes sooner it was standard, I further explained to
25 him why that was because of the AO monitoring practice. But this PCP would not change
26 his mind. Dennis was not wanted here either.
27 34. All the LV NV PCP'S Dennis had behaved badly under anyone's standard. And the dis-
28 covered massive and selective purge that occurred to Dennis's VA medical records, our position is

1 was an intentional act. So very concerned now, Dennis removed his care in February 2020.
2 35. Summer of 2020 I, wife, discovered more erroneous medical records placed in Dennis's
3 2020 VA Electronic medical record. You will remember Dennis removed his care from the
4 LV NV VA System in February 2020 and he has not returned. Dennis had removed his care
5 5 months before these erroneous medical records were placed into Dennis's 2020 VA Electronic
6 medical records. These erroneous records directly threaten Dennis's lifelong VA entitlements.
7 Of further concern, we discovered these erroneous records are also found verbatim in his
8 VA C-File these same erroneous records recently discovered in his VA C-File that were not
9 expunged in 2006 as mandated. Further concerning is these erroneous records were dis-
10 covered placed on page 1, in the middle of, and on the very last page of Dennis's 2020 VA
11 Electronic medical record, again, we will show were placed there 5 months after Dennis left.
12 36. In April 2020 we experienced Veterans Affairs an improper handling of "VA Mileage Tra-
13 vel Reimbursement" funds. A fact is this improper handling jeopardized Dennis's VA lifelong benefits
14 and entitlements. What happened was for a first time Dennis received from the VA an un-
15 requested "VA Mileage Travel Reimbursement" check dtd. April 3, 2020. Dennis received it
16 at our home located only a few miles from all his then medical appointments, he received it
17 via the U.S. Mail, it was in the amount of \$121.11. This mysterious VA check, unlike any he
18 had received in the past had no details on it like all other VA mileage travel reimbursement checks
19 he received in the past. The only details on this "VA Mileage Travel Reimbursement" check were, it
20 was a VA travel mileage reimbursement check made out to Dennis Johnson and it was in
21 the amount of \$121.11, which happens to be too much of a mileage reimbursement amount under
22 any circumstances. Because we had and still have concerns about this check, we have not
23 cashed it. We still have it. We are determined to have VA explain this check to us. I, wife, called VA
24 and three times for details, after we received this VA check. Each time I called VA, I was given no
25 details at all about this VA check. We remain very concerned about this "VA Mileage Travel
26 Reimbursement" check, we want to know who initiated it, how it could be initiated without Dennis or
27 my signature, for what VA appointment the initiator claims it is reimbursing Dennis for mile-
28 age, and why it is for so much? Because fact is under VA rules and regulations only the Veteran or

1 his/her authorized Agent, this is only myself, wife. Dennis or I are the only ones allowed to
2 request this VA mileage reimbursement and insert Dennis's VA ID Card into a VA Kiosk to
3 electronically sign and submit this form for only exact mileage no more, more is fraudulent.
4 We do not understand how or why this happened. And VA could not, or would not, give us
5 any explanation. Had we cashed this erroneous VA check it could be detrimental for us.
6 37. All that has happened and continues to happen. We have sent several correspondences
7 to VA for over a year and VA did not responded back to us, some of our correspondences
8 required a response from VA in accordance with VA and HIPAA rules and regulations. So in
9 July 2020 we file what is called a VA95 Claim to address the problems. VA denied our VA95 Claim
10 on the basis Dennis's VA Records did not support our VA95 Claim. Our response was it did not make
11 sense VA would deny based on Dennis's VA records when our VA95 Claim was primarily about, and
12 I had shown, Dennis's VA records had experienced some type of massive and selective
13 purge event that permeated throughout all his VA medical records. I sent VA a couple of
14 well-organized notebooks that proved it. How can VA deny a Claim based on massively
15 manipulated records? Next, we formally requested VA to Reconsider their decision.
16 VA reconsidered and denied our VA95 Claim a second time. This denial was similiarly based.
17 It is our position VA's denials of our VA95 Claim was not a proper denial, rather VA has cho-
18 sen to be in denial of the facts of the VA95 Claim. This was surprising. We had shown a
19 massive purge had occurred all throughout Dennis's VA medical records recent and past medical re-
20 cords and erroneous medical records had been placed into Dennis's 2020 VA Electronic
21 medical records we also showed were placed there 5 months AFTER Dennis formally re-
22 moved his care from the LV NV VA System with a formal detailed letter that stated and supported
23 the mishandlings he suffered within LV NV VA. It was undeniable. How can VA deny?
24 38. Next, we were advised to contact the Office of Civil Rights. I did. Because I was able to show
25 irregularities within Dennis's VA medical records the OCR agreed to conduct a formal investigation
26 It lasted abt 9 months. The OCR was successful, where I was not, to have VA remove all the added
27 erroneous medical records LV NV VA had placed into Dennis's VA Electronic medical record
28 2018-2021. We remain extremely concerned because we realize all those erroneous records

1 had they remained in Dennis's VA medical records Dennis's VA lifelong benefits and entitle-
2 ments would have faced forfeiture at a next VA evaluation appointment. OCR's support and
3 their action that had these erroneous records removed has been invaluable to us.

4 39. The OCR however explained OCR does not have any authority over a Veteran's C-File
5 and referred us back to Veterans Affairs to resolve our discovery of 200+ pages that have
6 erroneous medical records on each of these pages. Since VA has not responded to me whatsoever
7 these erroneous records remain in Dennis's VA C-File to this day. There they remain a future
8 threat to Dennis's duly awarded VA lifelong benefits and entitlements. What can be done?

9 40. The massive purge throughout Dennis's VA medical records is NOT resolved. OCR appears to
10 have accepted VA's response these missing records must be a printer error or the result of a corrupt
11 disc, although I refuted VA's response. I said this massive purge event it is proven by a close review
12 of his records, then one sees with their own eyes a type of destruction event unfolded over
13 time that has destroyed the integrity of Dennis's VA medical records. I provided OCR con-
14 crete examples proofs of recent records missing. Yet OCR has closed their investigation.

15 41. Hence, now our only option to address the negligences Dennis has experienced still not
16 yet fully addressed and so remedied, most namely the negligent destruction that has occur-
17 red throughout Dennis's VA medical records and their implications what Dennis has lost caused by
18 these negligences, most namely the negligent destruction seen throughout Dennis's VA
19 medical records is to file suit in a Federal District Court. We appreciate the opportunity to
20 present our Case now before our justice system in this Federal District Court.

21 42. Our Case we present our VA95 Claim in full broken down into Exhibits and Attachments.
22 We also present our notebook I made into Exhibits where I gathered and organized all the
23 paperwork from our time with the Office of Civil Rights and their 9 month formal investigation. We
24 also present further discoveries I made in Dennis's VA medical record, which includes the
25 discovery of more manipulated and missing medical records. I am completely confident I am
26 able to show a massive destruction event(s) has occurred throughout Dennis's VA medical
27 records. I will present evidences this negligent mishandling of his VA medical records was
28 intentional and it was done to cover up VA mishandled his care and to retaliate against us.

1 43. Moreover, we have four (4) TeleVideos of all four of the LV NV VA PCP appointments Dennis
2 attended at the NV VA Laughlin Clinic from May 2018 thru August 2019. Because these TeleVideos
3 are so revealing of the improprieties Dennis experienced we listed these four (4) TeleVideos as evi-
4 dence in our "VA95 CLAIM FOR DAMAGE, INJURY, OR DEATH" forms, they are listed under
5 "WITNESSES". These forms are included in this legal filing in Exhibit A. It is important to remember
6 these four TeleVideo appointments were the appointments Dennis had at the NV VA Laughlin Clinic
7 that were right after Dennis transferred his care out of the LV NV VA SEC across town because
8 LV NV VA SEC mishandled him and his VA medical records. At these TeleVideo appointments it
9 was at the fourth appointment was when we discovered the LV NV VA SEC had improperly reattach-
10 ed their care to Dennis without our knowledge for us to later discover during this time period Dennis's
11 VA medical records underwent a massive purge event(s). When these TeleVideos are viewed one
12 sees with their own eyes Dennis's LV NV VA PCP's display improprieties, animosities and improper
13 conduct/disregard with and toward him as is explained in our VA95 Claim and now in this Federal
14 Lawsuit.

15 44. It is bewildering how this LV NV VA System and also Veterans Affairs thought it would be
16 acceptable to handle Dennis and his VA Medical Records and myself, wife, so unacceptably. More-
17 over how could they think they would get away with all of this? I cannot know the answer.
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Do not number these paragraphs

DEMAND FOR RELIEF

[State what you want the Court to do. Depending on your claims, you may ask the Court to award you money or order the defendant to do something or stop doing something. If you are asking for money, you can say how much you are asking for and why you should get that amount, or describe the different kinds of harm caused by the defendant.]

We are asking for damages caused by the fact Dennis's VA medical records have been at the very least severely mishandled that caused damage seen throughout all of Dennis's VA medical records. Because we experienced all the problems and because we can show the purge more than appears to be selective, it is our position Dennis's VA medical records were intentionally manipulated and purged. The records removed are events of the mishandlings and their supports and supports for Dennis's VA SC's. I can show this. We can see this mishandling has rendered Dennis's VA medical records corrupted, no longer authentic, no longer reliable. Dennis's VA records thousands of pages in total, a most useful tool I used to manage all his healthcare needs effectively and responsibly are now unreliable so are no longer a trusted source. This is unimaginable. Devastating. I, wife, was in the habit of using sharing

DEMAND FOR JURY TRIAL

[Check this box if you want your case to be decided by a jury, instead of a judge, if allowed.]

☒ Plaintiff demands a jury trial on all issues.

Respectfully submitted,

Date: 03/27/2023

Sign Name:

Dennis C. Johnson
Yvonne Johnson

Print Name:

Dennis C. Johnson Yvonne Johnson

[Copy this page and insert it where you need additional space.]

all his medical records with all his Doctors' maintaining well the continuity of his care. The fact I can no longer trust his VA medical records so I cannot share them is detrimental to the quality of his care in the future. Since we have lost the trusted use of, we have lost the use of this invaluable needed resource. I am extremely distressed. I am required, here, to calculate a monetary value for this invaluable resource Dennis's VA medical records. Our trusted council she first gave us needed advice on this figure in our VA95 Claim. We sought her advise again now at this Federal District level lawsuit. She knows money is not what drives us here that it is to make the VA accountable for their negligences and for Dennis to receive justice for all he has lost due to VA negligences. Everything considered she advised us to stand by our original figure in our VA95 Claim for these damages. Although she advised us the total overall combined figure for all the damages should be less than our original total figure, and if less, than only by about 10% less, this would demonstrate we want to remain reasonable.

Thus, _____

Damages: \$5,000,000.00.

Allow me to add this after thought... I informed VA formally in May 2020 of what looked like a massive purge had occurred in Dennis's VA medical records. I followed this up; and, for abt 2 years before this I had formally sent correspondences to VA about other irregularities, via many Requests For Amendment To The VA Record to address these irregularities, I not only did not receive a response from VA whatsoever during this 2+ years time, VA made no corrections whatsoever and irregularities kept occurring for as long as 5 months after Dennis left the VA. It is undeniable a type of VA medical records major mishandling event(s) occurred. Only much later after the OCR became involved the VA responded and only to the OCR. Although under the time of the OCR's involvement the VA finally did remove the several erroneous added alterations to Dennis's VA medical records; as a result, removing the threat of an upcoming forfeiture of Dennis's VA Benefits and Entitlements; yet, the massive purge of VA records was still not fully addressed or remedied. \$5,000,000 for damages is a fitting reasonable figure. It is also a large figure. Most important to us is Dennis receive Justice for all he has lost due to VA's neglig-

1 *[Copy this page and insert it where you need additional space.]*

2 ences and for the Veterans Affairs to be held accountable for these negligence's. To achieve these
3 important goals we have asked a fitting high amount. Under advisement this amount gives
4 the Court a just perimeter to choose from that allows the Court to determine and choose a figure
5 right most fair to provide Dennis proper Justice a figure that is high enough to also serve as a strong
6 deterrent that will make the VA not repeat these negligences and instead only focus on providing
7 safe, high quality healthcare to our Veterans our Heros.

DEMAND FOR RELIEF

[State what you want the Court to do. Depending on your claims, you may ask the Court to award you money or order the defendant to do something or stop doing something. If you are asking for money, you can say how much you are asking for and why you should get that amount, or describe the different kinds of harm caused by the defendant.]

We are asking for damages caused by the fact Dennis's healthcare and his VA medical records were so mishandled Dennis no longer trusts or feels safe to have his healthcare managed within his LV NV VA System. The result, Dennis lost the safe use of, so he lost the use of, his extremely valuable resource, his LV NV VA Healthcare System which is his VA entitlement. Furthermore, the fact the massive and selective purge to his VA medical records and its destruction permeated outward to his Arizona VA medical records and his California VA medical records and his 'Outside Doctors' VA medical records held within VA ROI, Dennis, both of us, have recently questioned if Dennis will be safe to have his healthcare managed within the AZ VA or the Calif. VA Systems should we ever have the want, desire or ability to return there. After recent careful thought our answer is "it is not possible to trust or feel safe any

DEMAND FOR JURY TRIAL

[Check this box if you want your case to be decided by a jury, instead of a judge, if allowed.]

☒ Plaintiff demands a jury trial on all issues.

Respectfully submitted,

Date: 03/24/2023

Sign Name:

Print Name:

Dennis C. Johnson Yvonne Johnson
Dennis C. Johnson Yvonne Johnson

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longer within any of these VA Systems". This is all an absolutely devastating loss. Now we must calculate a monetary value for the loss of this invaluable resource. We were advised the following amount will serve as an important deterrent for the VA System to not repeat any of these negligences; and, it will provide Dennis certain justice; and, then it is our hope other disabled Veterans in Nevada may benefit. This amount is the same amount in our VA95 Claim we have been advised is an amount we should stand by.

Damages: \$5,000,000.00.

We request half of the amount awarded for this loss to be given to the Disabled American Veteran's Organization – DAV's ID #31-0263158 – Nevada operations. In support of these disabled Veterans who were likely enrolled within this LV NV VA System.

DEMAND FOR RELIEF

[State what you want the Court to do. Depending on your claims, you may ask the Court to award you money or order the defendant to do something or stop doing something. If you are asking for money, you can say how much you are asking for and why you should get that amount, or describe the different kinds of harm caused by the defendant.]

We are asking for actual damages for the costs we will continue to have to pay we otherwise were no longer going to have to pay beginning September 2019. These are Dennis's Medicare costs. Dennis's Medicare well utilized and very useful for him in the past, is no longer needed. Dennis now with his many VA service-connected conditions all very progressed; our appropriate plan was to discontinue his Medicare so with all its costs and now have Dennis's cost-free VA full medical entitlement manage all of Dennis's health care needs within Dennis's choice the LV NV VA System all under one roof excellent continuity of care. For this reason alone is why in June 2019 we relocated here to N LV NV and purchased our new home here just minutes away from this LV NV VA System so they can care for him. Our move here was successful, it was no easy task with Dennis not well and I, wife, I am

DEMAND FOR JURY TRIAL

[Check this box if you want your case to be decided by a jury, instead of a judge, if allowed.]

☒ Plaintiff demands a jury trial on all issues.

Respectfully submitted,

Date: 03/24/2023

Sign Name:

Print Name:

Yvonne Johnson
Dennis C. Johnson
Dennis C. Johnson Yvonne Johnson

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disabled totally and permanently. Then in August 2019, 3-months after our move here, I, wife, discover the LV NV VA SEC whom mishandled Dennis's care had reattached to his care at the Laughlin NV VA Clinic across town and this happened 3 appointments ago without our knowledge; next, I discover during the time of their reattachment Dennis's VA medical records underwent some type of massive and selective purge; and, I have since discovered some of the purged medical records include a portion of Dennis's appointment in 2013 at LV NV VA with his previous LV NV VA PCP Dr, Tudla. I can show this missing portion began missing from his record after 2018 and it is a few pages that show Dennis was fully vetted at the LV NV VA System in 2013. With these discoveries Dennis lost all trust he no longer felt safe at the LV NV VA. So we removed his care from the LV NV VA in February 2020. As a result, I suddenly and with urgency was forced to find and secure Dennis new Doctors' & Specialists' in our new community, it was a monumental task. And so Dennis could see these new Doctors we had to keep his Medicare insurance. His Medicare insurance we were going to appropriately discontinue in September 2019 because we relocated here in June 2019 for the LV NV VA to fully manage his healthcare under his cost-free VA lifelong full medical federal entitlement we had relied upon, we should have been able to rely upon, but failed him. We relied upon it to our detriment. Our actual damages are these Medicare costs, they are calculated to be:

Actual Damages - Medicare Expenses Sept. 2019 thru Dennis's avg. lifespan – Calculated:

*Medicare related monthly expenses all combined: Abt \$600.00 a month.

Average life span for a male is 76.3 years-Dennis never a smoker/drinker/illicit drugs, etc. He will live past 80 years old, so at least 10 more years.

Thus, \$600.00 X (10 yrs)120 months = \$72,000 + Annual Increases;

thus, \$72,000 + \$5,000 = \$77,000.00

Damages: \$77,000.00

DEMAND FOR RELIEF

[State what you want the Court to do. Depending on your claims, you may ask the Court to award you money or order the defendant to do something or stop doing something. If you are asking for money, you can say how much you are asking for and why you should get that amount, or describe the different kinds of harm caused by the defendant.]

Now to calculate a monetary amount for all the extreme grief and stress Dennis has suffered the last 5-3/4 years now. I, wife, witnessed his intense grief and stress and an intense insecurity this has all caused him inside of him, seen in his eyes, he cried (3 yrs. ago), he does not cry. Therefore, \$1,000,000.00.

This is the same figure in our VA95 Claim. It was 2-1/2 years ago we first filed VA95. This figure, above, took into account the Spring 2017 when these problems first began through July 11, 2020 when we filed the VA95 Claim. It is almost 3 years later still in the thick of this. This figure we were counselled could be, should be higher now. However, to demonstrate we want to remain reasonable we chose to stay with this first figure not raise it. Thus, it remains at this reasonable figure \$1,000,000.00. We have been advised to stand by this figure.

DEMAND FOR JURY TRIAL

[Check this box if you want your case to be decided by a jury, instead of a judge, if allowed.]

☒ Plaintiff demands a jury trial on all issues.

Respectfully submitted,

Date: 03/24/2023

Sign Name: Dennis C. Johnson Young Johnson

Print Name: Dennis C. Johnson Young Johnson

CLAIMS

First Claim

(Name the law or right violated: 1. "Nondiscrimination on the Basis of Disability in State and Local Gov't Services" - Federal Regulation Title 28, Ch. 1 Part 35. 2. "VA Priority Group 1")
(Name the defendants who violated it: Southern NV VA System-N LV NV VA System)

[Explain briefly here what the law is, what each defendant did to violate it, and how you were harmed. You do not need to make legal arguments. You can refer back to your statement of facts.]

(Name the law or right violated: 1. cont'd, "VA Health Benefits Package - Priority Group 1")

1. Both this "Nondiscrimination" Law, and Dennis's VA awarded "VA Health Benefits Package - Priority Group 1" Package govern Dennis's Healthcare. The LV NV VA violated both.

2. The "Nondiscrimination" Law prohibits discrimination to provide healthcare based on disability. The LV NV VA System actively tried not to serve Dennis due to his "complex" medical conditions, even though Dennis's complex health conditions are VA service-connected (VA SC). Please refer to Exhibit A "Our VA95 Claim" for details, refer to pages

All Exhibit A.

3. The discrimination Dennis experienced I hope to prove, although unlike the other violations I am able to prove with actual evidence, I only have circumstantial evidence to show the discrimination that occurred. However, there are four (4) Televideos of four appointments you see I identified in our VA95 Claim as evidence, to get these Televideos shows about everything.

4. The "VA Health Benefits Package - Priority Group 1" awarded by VA to Dennis allows Dennis the choice to receive his VA awarded cost-free full healthcare package and at any VA System in the United States. Yet, VA Doctors' at LV NV VA took it upon themselves to attempt to deny care.

5. The LV NV VA System actively made many attempts not to serve Dennis at the LV NV VA System. These attempts are detailed in this legal filing in "Exhibit A - Our VA95 Claim" on the forms, titled, "CLAIM FOR DAMAGE, INJURY OR DEATH STANDARD FORM 95", in particular under 10d. and 10d.cont'd.

6. When Dennis stayed at LV NV VA the Doctors' first at VA SEC Clinic, then over time Doctors' and Staff throughout the LV NV VA System shockingly one after another they

FIRST CLAIM, CONT'D Claim

(Name the law or right violated: 1. "Nondiscrimination on the Basis of Disability in State and Local Gov't Services" - Federal Regulation Title 28, Ch. 1 Part 35. 2. "VA Priority Group 1")

(Name the defendants who violated it: Southern NV VA System-N LV NV VA System)

thought it acceptable to provide Dennis with less than the standard of care on multiple occasions, as described in detail in, "Exhibit A - Our VA95 Claim" on the forms, titled, "CLAIM FOR DAMAGE, INJURY OR DEATH STANDARD FORM 95", in particular under 10d. and 10d.cont'd.

7. Then came the first VA medical records alterations that began in Aug. 2017 and continued that attempted to hide mishandlings of Dennis's care and of Dennis's VA Medical Records at VA SEC, described in detail in, "Exhibit A - Our VA95 Claim" on the forms, titled, "CLAIM FOR DAMAGE, INJURY OR DEATH STANDARD FORM 95", in particular under 10d. and 10d.cont'd. Later a massive purge in Dennis's VA Medical Records is seen, and because I can show the manipulated and purged VA medical records all had in common they detailed the mishandlings or supported it, the purge too, I more than postulate it was another attempt to hide the mishandlings with Dennis's care and his VA Medical Record.

8. Next, because I can show most of the manipulated/purged VA medical records had in common they were a support to Dennis's VA monetary compensation and benefits/entitlements awards, and the erroneous alterations added to Dennis's VA Medical Record all completely jeopardized Dennis's VA monetary compensation and benefits/entitlements awards so a direct threat of forfeiture of all of them, the massive purge(s), the destruction done to Dennis's VA Medical Records, I postulate it was performed as a retaliation against Dennis because he stayed at LV NV VA System AND because I, wife, was forced to formally complain to VA at high levels.

9. The LV NV VA System is not operating properly. And because Veterans Affairs did not respond to us after our first complaint in July 2017 for over 2 years we were ignored by VA despite our many correspondences/complaints for help VA mandated to respond, but did not; and, when we informed VA Affairs of the massive manipulation/purge to Dennis's VA medical records, VA continued to ignore us, hence, we were forced to bring OCR in for support then VA responds with confusion and denials I, wife, clarified and refuted. Because of all this we must postulate Veterans Affairs has involvement in the mishandlings or at the very least VA appears complicit.

SECOND Claim

(Name the law or right violated: 2." Negligence" - Life-Threatening Medication Errors)

(Name the defendants who violated it: Southern NV VA System-N LV NV VA System)

1. Urgent Note here: Dennis is not feeling well again still recovering from his latest Cancer diagnosis. So I need to simplify here go straight to the details. So I refer you straight to our VA95 Claim it is all presented here in this lawsuit broken down into legal Exhibits that begin with our first of several Exhibits, "Exhibit A-Our VA95 Claim". For this Claim, now, I refer you to this "Exhibit A-Our VA95 Claim", on the forms, titled, "CLAIM FOR DAMAGE, INJURY OR DEATH STANDARD FORM 95", in particular under 10d. and 10d.cont'd., in particular to pages

All Exhibit A.

2. This Claim the mishandling of Dennis's medications is connected to all of the Claims. First, I more than postulate it was one of the several actions of discrimination not to serve Dennis here to make him want to return to the Arizona VA. However Dennis stayed and I, wife, submitted a formal complaint to VA to address these improper events to resolve these issues but this only served to upset these Doctors and the situation escalated into what are our other Claims. The purge and destruction of Dennis's VA medical records was a final attempt to hide the escalated mishandling of Dennis and his VA medical records.

3. These improper acts/violations then caused Dennis and myself to loose trust in the LV NV VA System and no longer feel safe to have them manage Dennis's healthcare. As a dissillusioning result Dennis lost the use of this LV NV VA System his cost-free full medical healthcare his entitlement.

4. This LV NV VA System does not behave like the Arizona VA System or the California VA System. This LV NV VA System behaves improperly. The culture here, without saying it again that it is the Doctors, the culture it is not patient-based or compassionate care-based.

5. Had I not been able to follow Dennis's care so very closely and witness all I witnessed and see all the irregularities occur in Dennis's VA Medical Record even to the point after I made 2 of the complaints I saw after each complaint VA medical records that showed or supported each complaint suddenly disappeared from Dennis's VA Medical Records. Had I not caught these

1 *[Copy this page and insert it where you need additional space.]*

2 these improprieties these serious mishandlings, I hate to think what more Dennis may have
3 suffered and lost.

4 6. Because some of the manipulated and purged VA medical records was from this appointment
5 dated June 21, 2017 that include this medication mishandling/negligence that appears to
6 attempt to hide the medication mishandling/negligence, that although it happened back in the Sum-
7 mer of 2017, because the medication mishandling/negligence was discovered altered in the
8 VA Medical Records years later and so is in our VA95 Claim that is a part of this lawsuit, it is
9 our position Dennis may still be able to receive a justice for that medication negligence.
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THIRD Claim

(Name the law or right violated: 3. Negligence - Mishandling of VA Medical Records-Falsifying the VA Med. Rec.- Unlawful Destruction of the VA Med. Rec.)

(Name the defendants who violated it: Southern NV VA System-N LV NV VA System)

1. Urgent Note here: Dennis is not feeling well again still recovering from his latest Cancer diagnosis. So I need to simplify here go straight to the details. So I refer you straight to our VA95 Claim it is all presented here in this lawsuit broken down into legal Exhibits that begin with our first of several Exhibits, "Exhibit A-Our VA95 Claim". For this Claim, now, I refer you to this "Exhibit A-Our VA95 Claim", on the forms, titled, "CLAIM FOR DAMAGE, INJURY OR DEATH STANDARD FORM 95", in particular under 10d. and 10d.cont'd., in particular to pages All Exhibit A.

2. Our Exhibits in this lawsuit, are our VA95 Claim organized into legal Exhibits; and, Dennis's VA Compensation File (VA C-File) made into legal Exhibits; and, all of our materials from our 1-year with the Office of Civil Rights (OCR) organized into legal Exhibits, etc., I more than postulate will prove this Claim(s), and all of the Claims in this lawsuit for that matter.

DUPLICATE PAGE -
REMOVED.

FOURTH Claim

(Name the law or right violated: 4. "Negligence"-Mishandling of the Veteran's VA Compensation File-Failure to Remove Expunged Erroneous Medical Records

(Name the defendants who violated it: Veterans Affairs)

1. Urgent Note here: Dennis is not feeling well again still recovering from his latest Cancer diagnosis. So I need to simplify here go straight to the details.

2. Our Exhibits in this lawsuit, are our VA95 Claim organized into legal Exhibits; and, Dennis's VA Compensation File (VA C-File) made into legal Exhibits; and, all of our materials from our 1-year with the Office of Civil Rights (OCR) organized into legal Exhibits, etc.,

I more than postulate will prove this Claim(s), and all of the Claims in this lawsuit for that matter.

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FIFTH Claim

(Name the law or right violated: 5. "Negligence"-Mishandling of the Veteran's VA Compensation File - Failure to Protect Privacy and Confidentiality)

(Name the defendants who violated it: Veterans Affairs)

1. Urgent Note here: Dennis is not feeling well again still recovering from his latest Cancer diagnosis. So I need to simplify here go straight to the details.

2. Our Exhibits in this lawsuit, are our VA95 Claim organized into legal Exhibits; and, Dennis's VA Compensation File (VA C-File) made into legal Exhibits; and, all of our materials from our 1-year with the Office of Civil Rights (OCR) organized into legal Exhibits, etc., I more than postulate will prove this Claim(s), and all of the Claims in this lawsuit for that matter.

SIXTH Claim

(Name the law or right violated: 6. "Negligence" - Failure to Maintain and Provide Accurate and Adequate VA Medical Records)

(Name the defendants who violated it: Veterans Affairs; N LV NV VA System)

1. Urgent Note here: Dennis is not feeling well again still recovering from his latest Cancer diagnosis. So I need to simplify here go straight to the details. So I refer you straight to our VA95 Claim it is all presented here in this lawsuit broken down into legal Exhibits that begin with our first of several Exhibits, "Exhibit A-Our VA95 Claim". For this Claim, now, I refer you to this "Exhibit A-Our VA95 Claim", on the forms, titled, "CLAIM FOR DAMAGE, INJURY OR DEATH STANDARD FORM 95", in particular under 10d. and 10d.cont'd., in particular to pages All Exhibit A.

2. Our Exhibits in this lawsuit, are our VA95 Claim organized into legal Exhibits; and, Dennis's VA Compensation File (VA C-File) made into legal Exhibits; and, all of our materials from our 1-year with the Office of Civil Rights (OCR) organized into legal Exhibits, etc., I more than postulate will prove this Claim(s), and all of the Claims in this lawsuit for that matter.

SEVENTH Claim

(Name the law or right violated: 7. Hostile and Abusive Environment Within the N LV NV VA Medical System - Failure to Provide a Safe Environment)

(Name the defendants who violated it: N LV NV VA System; Veterans Affairs)

1. Urgent Note here: Dennis is not feeling well again still recovering from his latest Cancer diagnosis. So I need to simplify here go straight to the details. So I refer you straight to our VA95 Claim it is all presented here in this lawsuit broken down into legal Exhibits that begin with our first of several Exhibits, "Exhibit A-Our VA95 Claim". For this Claim, now, I refer you to this "Exhibit A-Our VA95 Claim", on the forms, titled, "CLAIM FOR DAMAGE, INJURY OR DEATH STANDARD FORM 95", in particular under 10d. and 10d.cont'd., in particular to pages All Exhibit A.

2. Our Exhibits in this lawsuit, are our VA95 Claim organized into legal Exhibits; and, Dennis's VA Compensation File (VA C-File) made into legal Exhibits; and, all of our materials from our 1-year with the Office of Civil Rights (OCR) organized into legal Exhibits, etc., I more than postulate will prove this Claim(s), and all of the Claims in this lawsuit for that matter.

END

CIVIL COMPLAINT FORM